IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND BALTIMORE DIVISION

EQUAL EMPLOYMENT)
OPPORTUNITY COMMISSION,) Civil Action:
) 21-cv-02492-RDB
)
V 1)
Judgment Creditor,)
)
V.)
Above All Odds, LLC)
)
Judgment Debtor.)
)

Application to Show Cause Why Raymond Dorsey and Turner Rascoe Should not be
Held in Contempt for Failure to Comply with Court Order Compelling Production of Discovery
Responses

Plaintiff Equal Employment Opportunity Commission (EEOC) moves this Court to hold Turner Rascoe and Raymonde Dorsey, officers of Judgment Debtor Above All Odds (AAO) in contempt pursuant to Fed. R. Civ. P. 37(b)(2)(vii) for failing to respond to Plaintiff's interrogatories and request for production of documents as ordered by the Court on September 22, 2022. (ECF No. 21). To date, neither Turner nor Dorsey has responded to the Interrogatories and Requests for Production despite receiving the Court's order. As set forth in the attached memorandum a finding of contempt and a daily monetary fine are appropriate sanctions for procuring compliance with the order.

Respectfully submitted,

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Certificate of Service

I, Eric S. Thompson, hereby certify that on this 12th, day of January 2023, the foregoing was served by overnight delivery to:

Raymond Dorsey 158 Barnsfield Ct 1 Gaithersburg, MD 20878

Turner Rascoe 503 Goldeneye Ct. Edegewood, MD 21040

Respectfully submitted,

/S/

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